



DATE: July 3, 1985

TO: Division File

FROM: Mike Grant - DLPC - Collinsville

SUBJECT: LPC 1191150001 - Madison County - Wood River/Amoco-Main Plant - ILD980700967

EPA Region 5 Records Ctr.



360705

On June 28, 1985 at 10:20 a.m., this office received a telephone call from Ron Kincaid, Director of Public Works for the City of Wood River. He said his call was in reference to the dumping of hazardous waste on the ground at the Amoco-Main Plant. I attempted several times to return Mr. Kincaid's phone call. At 1:15 p.m. I left a message to have him return my call. At 1:46 p.m. I received a phone call from Mr. Kincaid.

The following information was received from Mr. Kincaid. An anonymous Amoco employee had telephoned him this morning. The employee said Amoco was dumping Aluminum Chloride onto the ground and washing it with water, creating a hydrogen chloride plume. The employee questioned the supervisor about this process. The supervisor told him they had to get rid of it and to do it after dark, however time was running out to get rid of it, so they started doing it during the day. Employee told Mr. Kincaid that he saw a plume as large as a football field as far to the east as Sixth Street. I asked Mr. Kincaid if the employee indicated the location, within the facility, where this was occurring. He said no. I told him we would check it out immediately.

After speaking to Mr. Kincaid, I pulled the Amoco file and informed Tom Powell. Available information states that Aluminum Chloride is highly reactive with water. Past inspections reviewed in the file showed that two impoundments were used at one time to dispose of Aluminum Chloride, however, these two impoundments have been closed under RCRA. Tom and I then left for Amoco to investigate this complaint.

At 2:45 p.m. we arrived at the guard house at Amoco and requested to speak to Mr. Dick Sumner, Environmental Engineer. He could not be located within the plant. I then requested to speak to someone else in charge. The guards then phoned Mr. Bill St. Peters, Manager of Safety and Security. I spoke with him on the phone and told him we had received a complaint and wanted to investigate it. He told me he would find Mr. Sumner. At 3:15 p.m. we were finally able to meet with Mr. Sumner and Ron Herzog. I explained why we were there and we wanted to check it out.

Mr. Sumner then explained what they were doing as we drove to the area. Aluminum Chloride is used in the Polypropene Unit. Aluminum Chloride had been spilled from the silo and approximately 38 drums were cleaned up. As a result of the spill, the Aluminum Chloride became off-specification because of the high moisture content. Mr. Sumner said he contacted the manufacturer, however, the manufacturer would not take it back. Amoco then decided to treat this reactive waste with the following methods.

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Per Mr. Sumner, Mr. Herzog, and Mr. Jim Moore, the process supervisor a shovel full of Aluminum Chloride was spread onto the ground and flushed with water. A water wall was in place to knock down any vapors. The resultant material was then washed into the sewer. Per Mr. Moore, the resultant material is Aluminum Hydroxide or Alum, which is a good flocculent for their waste water treatment plant. In this area we observed eleven empty drums which we were told had already been processed. A building to the west of this area contained the remaining twenty-seven drums none of which were labelled or identified. The area where the treatment had been occurring was on a limestone covered lot with a concrete foundation. To the east of this area was a fire hose layed out into a figure eight pattern with three sprinklers dispersed and connected to a fire hydrant. The storm sewer was located north of the hydrant which was down gradient from the treatment area. Also what was referred to as an "Arkansas Cooling Tower" was located east of the hydrant and storm sewer. An Arkansas Cooling Tower is a unit which water is sprayed onto the tank for cooling purposes. The water drips off the tank, some is recirculated and some of the water was flowing into the sewer. Mr. Sumner said this tank was also used as part of the water wall.

Mr. Powell asked if any sort of respiratory equipment was worn by the employee doing this treatment. Mr. Moore said no. We then told them that this process is a treatment of a hazardous waste and requires a permit and inclusion on the facility's Part A application. Mr. Powell then told Amoco to discontinue this activity until they received approval from the Agency. Mr. Herzog then asked if they could dispose of the remaining drums off-site at a permitted facility. We said yes. We asked how long this activity had been going on. They said off and on for about two weeks with the weather permitting. They then re-emphasized that only small quantities (shovel full) were treated at a time and that no large plumes to their knowledge were created. I asked Mr. Sumner if the employee was under constant supervision. He said no.

Mr. Powell then requested if a couple pictures could be taken of this area. A phone call was made and the pictures were allowed as long as they didn't show any of the process units. Mr. Powell then took four pictures of this area.

Therefore, since Amoco is pursuing closure of the facility rather than a Part B permit, this treatment activity should be addressed within the scope of closure at the facility. The following apparent violations were observed.

703.154(a)
725.131
21(f) of the Act

MDG:jlr

cc: Jeff Benbenek - DAPC
cc: Sally Springer
cc: Bruce Carlson
cc: Rama Chaturvedi
cc: DLPC - Collinsville✓

RECY (EMPTY)

FLOW
→

TREATMENT
AREA

SPRINKLER

SEWER

Hose

Hydrant

SPRINKLER

SPRINKLER

ARKANSAS
COOLING
TOWER

BUILDING
CONTAINING
27 REMAINING
DRUMS

~66'

~81'

AMOCO - MAIN PLANT
19150001
LD 980700967

M D Grant
7/2/85